REMARKS

Claims 1, 4-10, 12-16 and 19-22 were pending at the time of examination. Claims 1, 10, 16 and 21 have been amended. Claim 8 has been canceled. No new matter has been added. The applicants respectfully request reconsideration based on the foregoing amendments and these remarks.

Claim Rejections – 35 U.S.C. § 112

Claims 1, 10, 16, and 21 were rejected under 35 U.S.C 112, first paragraph as failing to comply with the written description requirement. In particular, the limitation recited as "...defines a context within which the differential name has an unambiguous meaning..." in claims 1, 10, 16, and 21 was objected to as not being mentioned in the specification. The applicants have amended the expression to read "... defines a context within which the differential name is distinct...", for which support can be found on page 12 of the specification, and which is in accordance with the Examiner's interpretation of the rejected limitation, as noted on page 3 of the most recent Office Action. The applicants respectfully submit that claims 1, 10, 16, and 21 now comply with the written description requirement, and that the rejection under 35 U.S.C 112, first paragraph be withdrawn.

Claim Rejections – 35 U.S.C. § 103

Claims 1, 4-8, 10, 12, 14, 16, 19, 21 and 22 were rejected under 35 U.S.C § 103(a) as being unpatentable over U.S. Patent No. 5,991,173 to Unger et al. (hereinafter "Unger") in view U.S. Patent No. 6,163,811 to Porter et al., and in further view of Ainon "Storing text using integer codes," 1986, *Proceedings of the 11th conference on Computational linguistics* (hereinafter Ainon). The applicants respectfully traverse this rejection.

Claim 1 has been amended to more precisely identify the invention by incorporating the limitations of claim 8 (now canceled). As amended, claim 1 explicitly states that the computer source program is compiled into an object code file containing differential names. It is respectfully submitted that none of the cited prior art, alone or in combination, shows a compilation scheme for a computer source program, where the end result is an object code file including differential names.

Furthermore, claim 1 recites:

"determining a differential name for the **encoded** program symbol name relative to a base symbol identifying a **containing scope** for the program symbol, wherein the containing scope is selected from a group consisting of: a namespace,

a package, a module, a container object, and a function, and defines a **context** within which the differential name is distinct, and wherein the differential name is formed at least in part by a sequence of characters constituting a subset of the encoded program symbol name;"

That is, in the applicants' invention the differential name is determined for the _encoded_ program symbol name - not for the program symbol itself that is part of the source program. Expressed differently, the applicants' invention, as defined in claim 1, generates a compressed form from a _translation_ of the original source program and not from the source program itself. The encoded program symbols that are compressed in the applicants' invention never appear within the source program. In contrast, all the compression techniques that are shown in the cited art relate to an original (typically textual) representation, and not on a translation thereof.

Furthermore, the compression techniques disclosed in the cited art all rely on the existence of what can be commonly characterized as a "corpus of previously encountered symbols" and a comparison or search of this corpus in order to generate the compressed version of the symbol. For example, Unger's technique (see col. 8, line 61) depends on identifying unique words and their frequency of occurrence, which is consistent with unstructured text compression, Porter's base/delta format is compression between a changed text and an original version of the same text, and Anion relies on a structured word list.

In contrast, the applicants' invention does not require such a "corpus of previously encountered symbols." As can be seen in the claim limitation recited above, the differential name is defined relative to a base symbol that identifies a _containing scope_ which defines a _context_ within which the differential name is distinct. That is, the compression occurs relative to the context of the encoded program symbol name, which is known a priori and without the existence or examination of any prior corpus. Furthermore, claim 1 specifically identifies a number of containing scopes, such as, a namespace, a package, a module, a container object, and a function. No such contexts or containing scopes are mentioned in any of the prior art documents of record. For at least the above reasons, it is respectfully submitted that the rejection of claim 1 is unsupported by the cited art and should be withdrawn.

Claim 16 is a _Beauregard_ claim corresponding to claim 1. For reasons substantially similar to those set forth above, the applicants respectfully contend that the rejection of claim 16 is unsupported by the cited art and should be withdrawn.

Claims 4-7 and 9 depend from claim 1, and the rejections of these claims are unsupported by the cited art for at least the reasons discussed above with regards to claim 1, and should be withdrawn.

Claims 19-20 depend from claim 16, and the rejections of these claims are unsupported by the cited art for at least the reasons discussed above with regards to claim 16, and should be withdrawn.

Claim 10 describes a method for generating encoded program symbol names in an uncompressed form, and was rejected for the same rationale that was set forth in the rejection of claim 1. Claim 10 contains limitations relating to program symbol names, base symbols, and differential program symbol names and formats. Consequently, for at least the reasons discussed above with regards to claim 1, the applicants respectfully contend that the rejection of claim 10 is unsupported by the cited art and should be withdrawn.

Claim 12 depends from claim 10, and the rejection of this claim is therefore unsupported by the cited art for at least the same reasons, and should be withdrawn.

Claim 21 is a *Beauregard* claim corresponding to claim 1. For reasons substantially similar to those set forth above, the applicants respectfully contend that the rejection of claim 16 is unsupported by the cited art and should be withdrawn.

Claim 13 was rejected for substantially the same reasons as claim 1. Claim 13 includes the limitation that the enhanced compiler includes "one or more differential names corresponding to the program symbol names." The program symbol names and the differential names have been discussed above with respect to the rejection of claim 1. For reasons substantially similar to those set forth above with regards to claim 1, the applicants respectfully contend that the rejection of claim 13 is unsupported by the cited art and should be withdrawn.

Claims 14 and 15 depend from claim 13, and the rejections of these claims are unsupported by the cited art for at least the reasons discussed with regards to claim 13, and should be withdrawn.

Conclusion

The applicants believe that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,
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